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August 7, 2024

VIA ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square, Room 518
New York, NY 10007

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 8/8/2024

Re: *Fleming v. NADAP, Inc., et al*
Case No.: 1:23-cv-08892-VSB

Dear Judge Broderick:

We represent the Plaintiff Vallyn Fleming (“Plaintiff”) in the above-captioned case. We write jointly with Defendants to request a brief stay of the discovery schedule, including the deadline for the parties to conduct depositions, currently set for August 12, 2024, the requests for admissions deadline, currently set for August 22, 2024, and the discovery deadline, currently set for November 22, 2024. The parties have agreed to mediate this matter privately, and a mediation date has been scheduled for September 13, 2024.

The parties have exchanged initial documents and responses to interrogatories. Depositions have been noticed, but not yet scheduled. The parties are hopeful that with the limited discovery already exchanged, this matter may be resolved without the additional expense of depositions and the preparation of additional document responses.

This is the parties’ first joint request for a stay of discovery deadlines.

We thank the Court for its time and attention to this matter and its consideration of this request.

Respectfully submitted,
GODDARD LAW PLLC

/s/ Clela A. Errington

By: Clela A. Errington, Esq.

cc: All counsel [*Via ECF*]